

1 Robert A. Julian (SBN 88469)  
2 Cecily A. Dumas (SBN 111449)  
BAKER & HOSTETLER LLP  
600 Montgomery Street, Suite 3100  
3 San Francisco, CA 94111-2806  
Telephone: 415.659.2600  
4 Facsimile: 415.659.2601  
Email: rjulian@bakerlaw.com  
5 Email: cdumas@bakerlaw.com

6 Eric E. Sagerman (SBN 155496)  
7 David J. Richardson (SBN 168592)  
8 Lauren T. Attard (SBN 320898)  
BAKER & HOSTETLER LLP  
11601 Wilshire Blvd., Suite 1400  
Los Angeles, CA 90025-0509  
Telephone: 310.820.8800  
Facsimile: 310.820.8859  
Email: esagerman@bakerlaw.com  
Email: drichardson@bakerlaw.com  
Email: lattard@bakerlaw.com

12 | *Counsel for Official Committee of Tort Claimants*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

15 | In re:

16 | PG&E CORPORATION

-and-

18 || **PACIFIC GAS AND ELECTRIC  
COMPANY,**

## **Debtors.**

- 20       Affects PG&E Corporation
- 21       Affects Pacific Gas and Electric Company
- 22       Affects both Debtors

23 \*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)

**Bankruptcy Case  
No. 19-30088 (DM)**

## Chapter 11 (Lead Case) (Jointly Administered)

**EX PARTE APPLICATION OF THE  
OFFICIAL COMMITTEE OF TORT  
CLAIMANTS PURSUANT TO B.L.R.  
9013-1(c) FOR ENTRY OF AN ORDER  
AUTHORIZING OVERSIZE BRIEF IN  
OBJECTION TO CONFIRMATION OF  
DEBTORS' AND SHAREHOLDER  
PROPONENTS' JOINT CHAPTER 11  
PLAN OF REORGANIZATION DATED  
MARCH 16, 2020**

1 The Official Committee of Tort Claimants (hereafter, the “**TCC**”), in the chapter 11 cases  
2 (the “**Chapter 11 Cases**”) of PG&E Corporation and Pacific Gas and Electric Company (the  
3 “**Debtors**” or “**PG&E**”), by and through its undersigned counsel, hereby submits this Application  
4 (the “**Application**”) to the Court, pursuant to Rule 9013-1(c) of the Bankruptcy Local Rules for the  
5 United States District Court for the Northern District of California (the “**Bankruptcy Local**  
6 **Rules**”), for entry of an order authorizing the TCC to file an oversize brief (the “**Confirmation**  
7 **Brief**”) in support of the TCC’s objection to confirmation of the Debtors’ and Shareholder  
8 Proponents’ Joint Chapter 11 Plan of Reorganization Dated March 16, 2020. In support of this  
9 Application, the TCC respectfully submits the Declaration of Lauren T. Attard (the “**Attard**  
10 **Decl.**”), filed contemporaneously herewith.

## **MEMORANDUM OF POINTS AND AUTHORITIES**

## I. JURISDICTION

13 The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334,  
14 the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges, General Order 24  
15 (N.D. Cal.), and Bankruptcy Local Rule 5011-1(a). This is a core proceeding pursuant to 28 U.S.C.  
16 § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

## II. BACKGROUND

18 In accordance with this Court's orders on confirmation, including the order dated May 13,  
19 2020 [Dkt. 7182], objections to confirmation of the Plan are due on May 15, 2020. The TCC now  
20 seeks to file its Confirmation Brief, which will address the numerous confirmation issues raised by  
21 the Plan.

### **III. OVERSIZE BRIEFING FOR THE CONFIRMATION BRIEF IS WARRANTED**

23 Bankruptcy Local Rule 9013-1(c) provides that, "Unless the Court expressly orders  
24 otherwise, the initial and response memoranda of points and authorities shall not exceed 25 pages  
25 of text, and reply memorandum shall not exceed 15 pages of text." B.L.R. 9013-1(c).

26 The TCC respectfully submits that cause exists for the TCC to exceed the 25-page limit for  
27 its Confirmation Brief. Although the TCC has limited the length of its briefing as much as possible,  
28 the gravity of the issues presented in the Plan and the importance of the Court's determination of

1 the relief requested to the resolution of these Chapter 11 Cases have made it impracticable for the  
2 TCC to limit further the size of the Confirmation Brief.

3 The Debtors' counsel have informed the TCC that they have no objection to this request.  
4 See Attard Decl. at ¶ 8.

5 **WHEREFORE**, the TCC requests entry of an order granting the relief requested herein  
6 and such other and further relief as the Court may deem just and appropriate.

7  
8 Dated: May 15, 2020

Respectfully submitted,

9  
10 BAKER & HOSTETLER LLP

11 By: /s/ Lauren T. Attard  
12 Lauren T. Attard

13 *Counsel to the Official Committee of Tort Claimants*